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April 12, 2023

VIA ECF

Hon. Stewart Aaron, USMJ U.S. District Court Southern District of New York 500 Pearl Street, Courtroom 11C New York, NY 10007

Re: Alvarez v. MVP Group International, Inc.; 1:23-cv-01287-JHR-SDA

Dear Judge Aaron:

I am counsel for the defendant in this matter. I write, with the consent of plaintiff's counsel, William Downes, with whom I conferred by phone yesterday, to respectfully request a 30-day extension/adjournment of all pending pretrial dates as the parties attempt to resolve the matter. Based on yesterday's phone conversation, we have a reasoned basis to believe the matter can be resolved without the Court's intervention. An initial pretrial conference is scheduled for April 24 at 11 a.m. and defendant's Answer is due that same day.

Thank you for your consideration of this request.

Respectfully submitted,

BOND, SCHOENECK & KING, PLLC

Michael P. Collins

Member

MPC/dd